

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

IN RE: : CASE NO. 15-13678  
HENRY L. JACKSON, III : CHAPTER 13  
: JUDGE JEFFERY P. HOPKINS  
DEBTOR(S) : TRUSTEE'S OBJECTION TO DEBTOR(S)'  
MOTION TO RETAIN INSURANCE PROCEEDS

Comes now the Chapter 13 Trustee, Margaret A. Burks and files this objection to the Motion to Retain Insurance Proceeds (doc. 88) filed by debtor(s). The Trustee objects for the reasons stated herein.

The secured portion on the 2008 Cadillac CTS, owed to BMW Financial Services, the lienholder has been paid.

Trustee requests the amount needed to pay off the unsecured portion on the claim be turned over to disburse to the lienholder. Currently, this amount is \$2,344.05.

An Agreed Order can be reached between Counsel.

The Trustee requests that the Court uphold her objection.

Respectfully submitted,

/s/ Margaret A. Burks, Esq.  
Margaret A. Burks, Esq.  
Chapter 13 Trustee  
Attorney Reg. No. OH 0030377

Francis J. DiCesare, Esq.  
Staff Attorney  
Attorney Reg. No. OH 0038798

Tammy E. Stickley, Esq.  
Staff Attorney  
Attorney Reg No. OH 0090122

600 Vine Street, Suite 2200  
Cincinnati, OH 45202  
513-621-4488  
513 621-2643 (facsimile)  
[mburks@cinn13.org](mailto:mburks@cinn13.org) Correspondence  
[fdicesare@cinn13.org](mailto:fdicesare@cinn13.org)  
[tstickley@cinn13.org](mailto:tstickley@cinn13.org)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Objection to Motion to Retain was served **electronically** on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and by **ordinary U.S. Mail** on April 18, 2019 addressed to:

Henry L. Jackson, III  
Debtor(s)  
5499 Sterling Lakes Circle, Apt. 206  
Cincinnati, OH 45040

/s/Margaret A. Burks, Esq.  
Margaret A. Burks, Esq.

Francis J. DiCesare, Esq.

Tammy E. Stickley, Esq.